

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
Southern Division**

**GLORIA COOKE**

\*

**Plaintiff,**

\*

**v.**

\*

**Case No.: 8:20-cv-00181**

**SHAPIRO & BROWN, LLP, *et al.***

\*

**Defendants.**

\*

\* \* \* \* \*

**NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. §§1331, 1367, 1446, and Local Rule 103.5, Defendant Shapiro & Brown, LLP (“Shapiro & Brown”), through counsel, files this Notice of Removal and states as follows:

1. Shapiro & Brown is a defendant in Case No. CAL19-40218, filed in the Circuit Court for Prince George’s County, Maryland (the “State Court Action”).

2. Plaintiff Gloria Cooke (“Plaintiff”) filed her complaint in the State Court action on approximately December 18, 2019. **Exhibit 1:** State Court Action Complaint. The Circuit Court issued a Writ of Summons on approximately December 18, 2019. **Exhibit 2:** State Court Action Summons.

3. Shapiro & Brown was served through its registered agent on December 23, 2019 via Certified Mail. **Exhibit 3:** Service of Process. This Notice of Removal is timely filed pursuant to 28 U.S.C. §1446, as thirty (30) days have not elapsed since Shapiro & Brown’s receipt of the summons or initial pleading setting forth Plaintiff’s claim for relief.

4. The State Court Action asserts a claim for violation of the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. § 1692c(a)(2), and Fair Credit Reporting Act (“FCRA”), 15 U.S.C. § 1681s-2(b)(1). **Ex. 1.** This Court has original jurisdiction over the FDCPA and FCRA claims pursuant to 28 U.S.C. § 1331 and 15 U.S.C. §§ 1692, 1681s-2, *et seq.*

5. The State Court Action asserts a claim for violation of the Maryland Consumer Debt Collection Act (“MCDCA”), Md. Code Ann., Comm. Law Art. § 14-202, and Maryland Consumer Protection Act (“MCPA”), Md. Code Ann., Com. Law § 13-301. **Ex. 1.** This Court has supplemental jurisdiction over the MCDCA and MCPA claims pursuant to 28 U.S.C. § 1367.

6. The Notice of Removal will be filed promptly in the State Court Action and served upon Plaintiff and Defendant Bank of America.

7. Copies of process and pleadings in the State Court Action which have been received by Shapiro & Brown are attached hereto as set forth below.

- Plaintiff’s Complaint, filed with the Circuit Court for Prince George’s County, Maryland on approximately December 18, 2019, attached hereto as **Exhibit 1**.
- Writ of Summons to Shapiro & Brown, issued by the Circuit Court for Prince George’s County, Maryland on approximately December 18, 2019, attached hereto as **Exhibit 2**.
- Notice of Service, created by Shapiro & Brown’s registered agent, attached hereto as **Exhibit 3**.

WHEREFORE, Shapiro & Brown removes the subject action from the Circuit Court for Prince George’s County, Maryland to this United States District Court for the District of Maryland.

Dated: January 22, 2020

Respectfully submitted,

/s/ Julia K. Whitelock  
Julia K. Whitelock, Esq. (#19380)  
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*Counsel for Defendant Shapiro & Brown, LLP*

**CERTIFICATE OF SERVICE**

I HEREBY certify that on this 22<sup>st</sup> day of January, 2020, I served a copy of the foregoing via U.S. mail, postage prepaid on the following:

Quin B. Lobato, Esq.  
210 Grisdale Hill  
Riva, MD 21140

*Counsel for Plaintiff*

Bank of America  
c/o Corporation Trust Inc.  
2405 York Road, Suite 201  
Lutherville, MD 21093

*Defendant*

/s/ Julia K. Whitelock  
Julia K. Whitelock, Esq.